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8 *Attorneys for Defendant TM Equities, Inc.*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 CHRISTINA CANTU and REBEKAH
SVINNING, on behalf of themselves and all
12 others similarly situated,

13 Plaintiffs,

14 v.

15 THOMPSON MICHIE ASSOCIATES, LLC, a
foreign limited liability company; TM
16 EQUITIES INC., f/k/a THOMPSON MICHIE
ASSOCIATES, INC., a foreign corporation;
17 DOES 1 through 50, inclusive,

18 Defendants.
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Case No. 2:24-cv-00908

**STIPULATION AND ORDER
EXTENDING DEADLINE FOR
DEFENDANT TM EQUITIES INC. TO
FILE REPLY IN SUPPORT OF MOTION
TO DISMISS**

(FIRST REQUEST)

21 **STIPULATION**

22 Plaintiffs CHRISTINA CANTU and REBEKAH SVINNING, on behalf of themselves
23 and all others similarly situated (“Plaintiffs”) and Defendant TM EQUITIES INC. (“Defendant”)
24 (collectively “Parties”), by and through their undersigned counsel of record, hereby stipulate and
25 agree, pursuant to LR IA 6-1 and 6-2, as follows. This is the first request for the extension of this
26 deadline.

27 1. With this Court’s approval, the Parties have previously agreed and stipulated to
28 extend the time for Defendant’s response to Plaintiff’s Complaint, which was originally due to be

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1 filed on May 21, 2024. By two separate stipulations, the Parties agreed to extend Defendant's
2 deadline from May 21, 2024, to June 4, 2024. (ECF Nos. 6, 8.)

3 2. On June 4, 2024, Defendant filed its Motion to Dismiss Pursuant to FRCP 12(b)(2)
4 and 12(b)(6) (ECF No. 11) (the "Motion").

5 3. On June 19, 2024, Plaintiffs filed their Opposition to the Motion (ECF No. 17).
6 By this Stipulation, Defendant accepts and acknowledges the filing of Plaintiffs' Opposition as
7 timely, and further agrees not to oppose any extension motion related to Plaintiff's Opposition
8 that the Court may deem necessary.

9 4. By this Stipulation, Plaintiffs agree to a two-day extension of Defendant's deadline
10 to file a reply in support of its Motion ("Reply").

11 5. Wherefore Defendant and Plaintiffs hereby agree to extend the deadline for
12 Defendant to file its Reply in support of the Motion from June 26, 2024, to June 28, 2024.

13 6. The Parties reserve all defenses and objections subject to this Stipulation (i.e., this
14 Stipulation shall control).

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7. This Stipulation is made to accommodate the negotiations of counsel as they attempt to come to agreement regarding a potential stay of all deadlines in this matter pending the scheduling of mediation, and not for the purpose of delay. Therefore, good cause exists to extend the deadline for Defendant's Reply.

IT IS SO STIPULATED.

Dated this 25th day of June, 2024.

HOLLAND & HART LLP

RAFI & ASSOCIATES, P.C.

/s/ Sydney R. Gambee

/s/ Jason Kuller

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Attorneys for Defendant TM Equities, Inc.

Attorneys for Plaintiffs

ORDER

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

Dated: June 25, 2024

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